

**WINDELS MARX LANE & MITTENDORF, LLP**

156 West 56th Street

New York, New York 10019

Tel: (212) 237-1000

Fax: (212) 262-1215

Howard L. Simon (hsimon@windelsmarx.com)

Antonio J. Casas (acasas@windelsmarx.com)

John J. Tepedino (jtepedino@windelsmarx.com)

*Special Counsel for Irving H. Picard, Trustee  
for the Substantively Consolidated SIPA Liquidation  
of Bernard L. Madoff Investment Securities LLC  
and Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant,

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the  
Substantively Consolidated SIPA Liquidation of  
Bernard L. Madoff Investment Securities LLC  
and Bernard L. Madoff,

Plaintiff,

v.

BANQUE INTERNATIONALE À  
LUXEMBOURG S.A. (f/k/a Dexia Banque  
Internationale à Luxembourg S.A.), individually  
and as successor in interest to Dexia Nordic  
Private Bank S.A.; RBC DEXIA INVESTOR  
SERVICES BANK S.A.; RBC DEXIA  
INVESTOR SERVICES TRUST; RBC DEXIA

Adv. Pro. No. 08-01789 (SMB)

SIPA Liquidation  
(Substantively Consolidated)

Adv. Pro. No. 12-01698 (SMB)

INVESTOR SERVICES ESPAÑA S.A.; and  
BANQUE INTERNATIONALE À  
LUXEMBOURG (SUISSE) S.A. (f/k/a Dexia  
Private Bank (Switzerland) Ltd.);

Defendants.

**STIPULATION EXTENDING TIME TO RESPOND**

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned herein, that the date by which Defendants Banque Internationale à Luxembourg S.A. (f/k/a Dexia Banque Internationale à Luxembourg S.A.) and Banque Internationale à Luxembourg (Suisse) S.A. (f/k/a Dexia Private Bank (Switzerland) Ltd.) (together, the “Stipulating Defendants”) must move, answer or otherwise respond to the complaint (the “Complaint”) filed in this adversary proceeding is extended up to and including August 29, 2014. The pre-trial conference previously scheduled for August 27, 2014 will be adjourned to October 22, 2014 at 10:00 a.m.

The purpose of this stipulated extension is to provide additional time for the Stipulating Defendants to answer, move against, or otherwise respond to the Complaint. Nothing in this stipulation is a waiver of the Stipulating Defendants’ right to request from the Court a further extension of time to answer, move or otherwise respond and/or the Trustee’s right to object to any such request.

Except as expressly set forth herein, the parties to this stipulation reserve all other rights and defenses they may have and entry into this stipulation shall not impair or otherwise affect such rights and defenses, including without limitation any defenses based on lack of jurisdiction.

This stipulation may be signed by the parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the same instrument. A signed facsimile, photostatic or electronic copy of this stipulation shall be deemed an original. This stipulation is entered into pursuant to the Order Granting Supplemental Authority to

Stipulate to Extensions of Time to Respond and Adjourn Pre-Trial Conferences (ECF No. 7037) in the main case (No. 08-01789 (SMB)).

Dated: New York, New York  
June 25, 2014

By: /s/ Antonio J. Casas  
Antonio J. Casas (acasas@windelsmarx.com)  
Windels Marx Lane & Mittendorf LLP  
156 West 56th Street  
New York, New York 10019  
Telephone: (212) 237-1000  
Facsimile: (212) 262-1215

*Special Counsel to Irving H. Picard, Trustee for  
the Substantively Consolidated SIPA Liquidation of  
Bernard L. Madoff Investment Securities LLC and  
Bernard L. Madoff*

Dated: New York, New York  
June 25, 2014

By: /s/ Jeff Butler  
Jeff Butler (jeff.butler@cliffordchance.com)  
Clifford Chance US LLP  
31 West 52nd Street  
New York, NY 10019-6131  
Telephone: (212) 878-8000  
Facsimile: (212) 878-8375

*Attorneys for Stipulating Defendants*